

**JOINT REPORT SETTING FORTH PROPOSED AGENDA
FOR JANUARY 14, 2022 STATUS CONFERENCE**

The Parties hereby present the following agenda items for discussion at the upcoming status conference of January 14, 2022:

1. Provide an update to the Court on the progress of discovery.
2. Discuss the timing of a Settlement Conference.

The Parties propose that the Court defer discussion of the number of fact depositions to be taken in the case until after Defendants have commenced their production of ESI, as the contents of ESI may inform the Parties' discussions concerning depositions.

Dated: January 12, 2022

Respectfully submitted,

By:

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